

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

JOHN DOE 1,	)	Case No. 1:23-cv-01960
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
Varsity Spirit, LLC, ET AL.,	)	
	)	
Defendants.	)	
	)	

**JOINT NOTICE OF SETTLEMENT BETWEEN PLAINTIFF AND  
DEFENDANTS Varsity Spirit, LLC; Varsity Brands, LLC;  
AND Varsity Brands Holding Co., Inc.**

Plaintiff John Doe 1 and Defendants Varsity Spirit, LLC; Varsity Brands, LLC; and Varsity Brands Holding Co., Inc. (the “Parties”) notify the Court that the above action has been settled as to between Plaintiff and Defendants Varsity Spirit, LLC; Varsity Brands, LLC; and Varsity Brands Holding Co., Inc.

Therefore, Plaintiff and Defendants Varsity Spirit, LLC; Varsity Brands, LLC; and Varsity Brands Holding Co., Inc. respectfully request that the Court enter the attached Order regarding the settlement of the case.<sup>1</sup>

---

<sup>1</sup> The responsive pleading of Defendants Varsity Spirit, LLC; Varsity Brands, LLC; and Varsity Brands Holding Co., Inc. is currently due on November 16, 2023. The Parties agree and stipulate that, if this matter is restored to the docket, Defendants Varsity Spirit, LLC; Varsity Brands, LLC; and Varsity Brands Holding Co., Inc. will have 14 days from the date of restoration to file their responsive pleading.

Date: November 15, 2023

/s/ Chelsea C. Weaver (Per Email Consent)

Charles H. Cooper, Jr. (0037295)

Rex H. Elliott (0054054)

Chelsea C. Weaver (0099981)

Cooper & Elliott, LLC

305 West Nationwide Boulevard

Columbus, Ohio 43215

Ph: (614) 481-6000

Fax: (614) 481-6001

Email: chipc@cooperelliott.com

rex@cooperelliott.com

chelseaw@cooperelliott.com

*Attorneys for Plaintiff John Doe 1*

/s/ Rebecca J. Bennett

Rebecca J. Bennett (0069566)

Ogletree, Deakins, Nash, Smoak & Stewart, P.C.

Key Tower

127 Public Square, Suite 4100

Cleveland, OH 44114

Ph: (216) 241-6100

Fax: (216) 357-4733

Email: rebecca.bennett@ogletree.com

*Attorneys for Defendant Varsity Spirit, LLC*

/s/ Ruth E. Hartman (Per Email Consent)

Carole S. Rendon (0070345)

Ruth E. Hartman (0069566)

Baker & Hostetler, LLP

Key Tower

127 Public Square, Suite 2000

Cleveland, OH 44114

Ph: (216) 861-7420

Email: crendon@bakerlaw.com

rhartman@bakerlaw.com

*Attorneys for Defendants Varsity Brands, LLC and  
Varsity Brands Holding Co., Inc.*

### **CERTIFICATE OF SERVICE**

The undersigned does hereby certify that a copy of the foregoing was filed this 16<sup>th</sup> day of November, 2023 through the Court's Electronic Filing System. Parties to this action can access this document through the Court's System. A copy of this Notice was also sent via email to the following counsel of record for Plaintiff.

Chelsea C. Weaver (0096850)  
COOPER ELLIOTT  
305 West Nationwide Boulevard  
Columbus, Ohio 43215  
(614) 481-6000  
(614) 481-6001 (Facsimile)  
chelseaw@cooperelliott.com

Bakari T. Sellers\*  
Amy E. Willbanks\*  
Mario A. Patella\*  
Jessica L. Fickling\*  
Alexandra Benevento\*  
STROM LAW FIRM  
6923 North Trenholm Road, Suite 200  
Columbia, South Carolina 29206  
(803) 252-4800  
(803) 252-4801 (Facsimile)  
bsellers@stromlaw.com  
awillbanks@stromlaw.com  
mnacella@stromlaw.com  
ifickling@stromlaw.com  
abenevento@stromlaw.com

S. Randall Hood\*  
Chad A. McGowan\*  
1539 Health Care Drive\*  
MCGOWAN, HOOD, FELDER & PHILLIPS, LLC  
Rock Hill, South Carolina 29732  
(803) 327-7800  
(803) 324-1483 (Facsimile)  
rhood@mcgowanhood.com  
cmcgowan@mcgowanhood.com

Whitney Boykin Harrison\*  
MCGOWAN, HOOD, FELDER & PHILLIPS, LLC  
1517 Hampton Street  
Columbia, South Carolina 29201  
(803) 779-0100  
(803) 787-0750 (Facsimile)  
wharrison@mcgowanhood.com

*Counsel for Plaintiff*

/s/ Rebecca J. Bennett  
*One of the Attorneys for Varsity Spirit, LLC*